

2. Counsel for Plaintiffs and Abbott in this case are currently preparing for a jury trial before the Hon. William J. Haddad of the Circuit Court of Cook County, Illinois, under the caption *Tietz v. Abbott Labs.*, No. 12L-002715. This trial is set to begin April 23, 2013.

3. The parties have conferred and agreed that a brief extension of the deadline to file dispositive motions is appropriate under the circumstances. Such an extension will materially enhance the preparation of the case, and will not prejudice either party or unduly delay this litigation. Therefore, it is respectfully requested that the remaining case deadlines be modified as follows:

Deadline to depose trial experts	<u>April 13, 2013</u>
Deadline to file dispositive motions	<u>June 19, 2013</u>
Deadline to file responses to dispositive motions	<u>July 17, 2013</u>
Deadline to file replies to dispositive motions	<u>July 31, 2013</u>

Dated: March 15, 2013

Respectfully submitted,

s/ Andrew P. Bautista

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2013, I electronically filed the foregoing document with the clerk of the U.S. District Court for the Western District of Tennessee, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who are known as the "Filing Users":

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A complete, duplicate copy of this document has been forwarded directly to Judge Young in Boston, MA.

s/ Andrew P. Bautista